

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SYNOVUS BANK)
Plaintiff,)
v.) Case No.: 2:11-cv-00715-SLB
PLASH ISLAND RESORT, LLC, et al.,)
Defendants.)

UNOPPOSED MOTION OF THIRD PARTY DEFENDANTS ANADARKO PETROLEUM CORPORATION, ANADARKO E&P COMPANY LP AND MOEX OFFSHORE 2007, LLC, FOR EXTENSION OF TIME

Subject to and without waiving any motions and/or defenses, including without limitation all motions and/or defenses available under Rule 12, Fed. R. Civ. P., and expressly reserving all such motions and/or defenses, defendants Anadarko Petroleum Corporation (“APC”), Anadarko E&P Company LP (“AE&P”) and MOEX Offshore 2007, LLC (“MOEX”) (collectively “Third Party Defendants”) respectfully request an additional thirty (30) days to respond to Third Party Plaintiff Plash Island Resort, LLC’s Complaint (“Third Party Plaintiff”), up to and including March 31, 2011. In support of this Motion, Third Party Defendants state as follows:

1. Third Party Plaintiff does not oppose Third Party Defendants' request for additional time to respond to the Complaint.

2. Third Party Defendants have been named in over one hundred (100) actions relating to the accident at issue that are currently pending in courts across the southeastern United States, including the Multidistrict Litigation before the Honorable Judge Barbier in the Eastern District of Louisiana.

3. Third Party Defendants are still investigating the accident at issue and the ensuing oil spill, as well as reviewing the numerous claims made against them in the cases filed to date. These cases involve complex facts and legal issues, including choice of law questions and possible motions pursuant to Rule 12(b) of the Federal Rules of Civil Procedure.

4. Third Party Plaintiff does not oppose an Order granting this motion, and entry of such an Order will not result in any prejudice to Third Party Plaintiff.

In accordance with the foregoing, Anadarko Petroleum Corporation, Anadarko E&P Company LP and MOEX Offshore 2007 LLC respectfully move the Court to enter an Order extending the time in which they may file Answers or otherwise respond to Plaintiff's Third Party Complaint by thirty (30) days, up to and including March 31, 2011.

Respectfully submitted,

/s/ Sid J. Trant

Sid J. Trant

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record for all parties.

/s/ Sid J. Trant
OF COUNSEL